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*Michael McCarthy and The DreamTeam Group, LLC*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

In re GALENA  
BIOPHARMA, INC.  
SECURITIES LITIGATION

Case No.: 3:14-cv-00367-SI (Lead)

**DEFENDANTS MICHAEL  
MCCARTHY'S AND THE  
DREAMTEAM GROUP LLC'S  
RESPONSE TO LEAD  
PLAINTIFFS' MOTION FOR  
CLASS CERTIFICATION**

Defendants The DreamTeam Group LLC and Michael McCarthy (collectively "DreamTeam") do not oppose lead plaintiffs' motion for class certification at this time. DreamTeam reserves all its rights to challenge the certification of a class at a later time.

DATED: October 14, 2016.

BALL JANIK LLP

/s/ Ciaran P.A. Connelly

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*Michael McCarthy and*

*The DreamTeam Group, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record who have consented to electronic notification.

DATED: October 14, 2016

/s/ Ciaran P.A. Connelly  
Ciaran P.A. Connelly